

CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B., D.P.,
A.F., C.A., R.K., K.P., and T.H.,

Plaintiffs,

v.

RED ROOF INNS, INC., FMW RRI
NC, LLC, RED ROOF
FRANCHISING, LLC, RRI WEST
MANAGEMENT, LLC, VARAHI
HOTEL, LLC, WESTMONT
HOSPITALITY GROUP, INC., and
RRI III, LLC,

Defendants.

PL Sum. J.

Ex. 076

CIVIL ACTION FILE

NO. 1:20-cv-5263-MHC

JURY TRIAL DEMANDED

Pursuant to Fed. R. Civ. P. 38

**PLAINTIFF R.K.'S OBJECTIONS AND RESPONSES TO
DEFENDANT RED ROOF INNS, INC.'S FIRST INTERROGATORIES**

Plaintiff R.K. ("R.K." or "Plaintiff") hereby provides objections and responses to Defendant Red Roof Inns, Inc.'s First Interrogatories (the "Interrogatories"). Plaintiff reserves the right to amend and supplement these responses as discovery progresses. Plaintiff states that, in these responses, she provides the identity of Victims of Sex Trafficking only subject to the Court's June 4, 2021 Protective Order (Doc. 74). Under this Order, during the pre-trial proceedings in this litigation and in any public filings,

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recall the specific hotel they stayed in in Louisiana but it may have been a La Quinta or Extended Stay America hotel.

Over the next four years, Bagz trafficked R.K. at various hotels in the Atlanta area, as well as hotels in other cities including a La Quinta in Baton Rouge, Louisiana. Hotels where R.K. was trafficked include:

- The Atlanta Red Roof Inn on North Druid Hills Road.
- ESA-1967 Leland Dr., Marietta, GA 30067
- ESA-3967 Peachtree Road, Atlanta, GA 30319
- ESA-2010 Powers Ferry Rd., Atlanta, GA 30339
- ESA-2239 Powers Ferry Rd., Atlanta, GA 30339
- ESA-2225 Interstate North Parkway, Atlanta, GA 30339
- ESA-6250 Corporate Blvd., Baton Rouge, LA 70809
- Microtel Inn & Suites on 1840 Corporate Blvd, Atlanta, GA 30329
- A Hampton Inn near the Red Roof Inn on North Druid Hills

Bagz was part of a group of traffickers called PIVIP, which stands for Pimps in Very Important Places. Other members of the PIVIP include Bless as well as traffickers named Kuuk, Fresh, CB, Quan, Diablo and Nitty.

During the time of her trafficking, including the trafficking by Bless in 2009 until she escaped in 2013, R.K. showed obvious signs of trafficking. For example, she was usually dressed up in full makeup, hair, and scantily clad outfits. Sometimes, she would be with her trafficker, who dressed in loud clothes with lots of “bling” and sagging pants like a rapper or a pimp. And when she was working, she’d see up to 10 buyers in a day, for an hour or so

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each. This constant stream of men coming to her room was another clear sign of prostitution and trafficking. R.K. and the other victims would also make many requests for additional towels and sheets and would fill trashcans with condoms that housekeeping staff would throw away.

The traffickers would advertise R.K. and other victims for commercial sex usually with Backpage. The traffickers had a call girl, like Chloe or another one named Black, to post the ads. Ashley may have also booked hotels and posted advertisements for the traffickers. Eventually, R.K. also posted her own ads.

Bagz was both violent and threatening and also sweet and kind to R.K. He manipulated R.K. into believing that she was needed and special, and eventually elevated her to what he called a “bottom bitch,” which meant that Bagz expected R.K. to help him manage other victims. R.K. believes that Bagz gave her the title of “bottom bitch” to manipulate her, because he knew she needed to feel wanted and special.

Bagz generally set a quota for R.K. and T.H. of \$1,000 per day. Because each buyer would usually pay \$100 for a half hour, that would mean the girls would each have to see up to ten buyers in a day. They had some customers who would pay up to \$300 for a session. R.K. had no say in who

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VERIFICATION

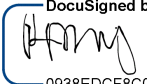
The answers set forth in **PLAINTIFF R.K.'S OBJECTIONS AND RESPONSES TO DEFENDANT RED ROOF INNS, INC.'S FIRST INTERROGATORIES** are true and correct to the best of my knowledge, information and belief based on the information currently available to me. I reserve the right to make changes to these Objections and Responses if it appears that an error or omission has been made therein or if more information becomes available.

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I hereby verify, pursuant to 28 U.S.C. § 1746 and subject to penalty of perjury that the factual information contained in the foregoing responses to interrogatories is true and correct to the best of my knowledge, information and belief.

This ____ day of August, 2021.

R.K.

DocuSigned by:

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